## UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF NEW YORK

CHAMILIA, LLC,	)
Plaintiff,	) Civil No.: 04-CV-06017 (KMK)
v.	)
PANDORA JEWELRY, LLC,	)
Defendant.	)

## **DECLARATION OF DAWN MOORE**

Pursuant to 28 U.S.C. § 1746, Dawn Moore declares as follows:

- 1. I am the owner of Highlands West Gift Company, located at 2176 East 540-A, Lakeland, Florida. Highlands West sells jewelry and other gift items.
- 2. In January 2005, I attended the America's Mart trade show in Atlanta. While at the trade show, I stopped by the booth occupied by Pandora Jewelry and talked to an individual named "Michael," who spoke with a foreign accent and introduced himself as the president and owner of Pandora. I also spoke to a female sales representative of Pandora whose name I cannot recall.
- 3. Michael said that Chamilia's jewelry was a "cheap imitation" of Pandora's jewelry, that Chamilia's jewelry didn't work properly, and that Chamilia had stolen the design of Pandora's charm bracelets. Michael claimed that the Chamilia beads did not screw on properly—something I have found to be totally incorrect. Michael also said that Pandora was the "original" and that it had a patent pending. Michael went on and on like this, bashing Chamilia.

The impression he created was that Chamilia had stolen the overall design for its charm bracelets from Pandora.

I declare under penalty of perjury that the foregoing is true and correct. Executed on May 11, 2005.